## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF VERMONT

UNITED STATES OF AMERICA,	)	
Plaintiff,	)	
	)	
v.	)	Docket No. 2:22-mj-56
	)	
CHRISTOPHER EMMONS,	)	
Defendant.	)	

## MOTION FOR DETENTION

NOW COMES the United States of America, by and through its attorney, Nikolas P. Kerest, United States Attorney for the District of Vermont, and moves for pretrial detention of the above-named defendant pursuant to 18 U.S.C. § 3142(e) and (f).

- 1. <u>Eligibility for Detention</u>. This defendant is eligible for detention because the case involves an offense under the Controlled Substances Act for which a maximum term of imprisonment of ten years or more is prescribed. *See* 18 U.S.C. § 3142(f)(1)(C)
- 2. <u>Reason For Detention</u>. The Court should detain the defendant because there are no conditions of release which will reasonably assure the safety of the community and the defendant's appearance as required.
- 3. <u>Rebuttable Presumption</u>. The United States will not invoke the rebuttable presumption against defendant under § 3142(e).
- 4. <u>Time For Detention Hearing</u>. The United States requests the court conduct the detention hearing after completion of the pretrial services report by the Probation Office.
- 5. Other Matters. Defendant Emmons is a convicted felon. During a search this morning of defendant Emmons' residence and property, law enforcement recovered the following:

- 14 firearms, including a sawed-off shotgun that appears to be a firearm restricted by the 1934 National Firearms Act.
- Approximately 28 grams of suspected cocaine base.
- Approximately 400 bags of suspected fentanyl

Dated at Burlington, in the District of Vermont, May 13, 2022.

Respectfully submitted,

NIKOLAS P. KEREST United States Attorney

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